

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MARK WINTER, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

v.

STRONGHOLD DIGITAL MINING, INC.,
GREGORY A. BEARD, RICARDO R. A
LARROUDÉ, WILLIAM B. SPENCE, B.
RILEY SECURITIES, INC., COWEN AND
COMPANY, LLC, TUDOR, PICKERING,
HOLT & CO. SECURITIES, LLC, D.A.
DAVIDSON & CO., COMPASS POINT
RESEARCH & TRADING, LLC, and
NORTHLAND SECURITIES, INC.,

Defendants.

Case No. 1:22-cv-03088-RA

**NOTICE OF MOTION AND MOTION FOR FINAL APPROVAL OF
CLAS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that, pursuant to the Order Granting Motion for Preliminary Approval of Class Action Settlement, on March 7, 2025 before the Honorable Ronnie Abrams, Thurgood Marshall United States Courthouse, 40 Foley Square, Courtroom 1506, New York, NY 10007, Lead Plaintiff Allegheny County Employees Retirement System will and hereby does move the Court for entry of an Order: (1) granting final approval of the Settlement in the Action on the terms set forth in the Stipulation; and (2) approving the proposed Plan of Allocation for distribution of the Net Settlement Fund.¹

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation of Settlement dated November 8, 2024 (Dkt. No. 121).

This motion is based on this Notice of Motion; the Memorandum of Law in Support thereof; the Declaration of Jonathan Stern in Support of the Motions for: (I) Final Approval of Class Action Settlement and Plan of Allocation; and (II) an Award of Attorneys' Fees, Reimbursement of Litigation Expenses, and Award to Lead Plaintiff; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

A proposed Order and Final Judgment granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadlines for objecting to the Settlement and requesting exclusion from the Settlement Class have passed.

Dated: March 7, 2025

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Jonathan Stern

Laurence Rosen

Jonathan Stern

Michael Cohen

Phillip C. Kim

The Rosen Law Firm, P.A.

275 Madison Avenue, 40th Fl.

New York, New York 10016

Lead Counsel for Lead Plaintiff and the Class